

39. (Original) The method of claim 38, wherein the order status is shown as complete upon receipt of both the service order completion data and the frame order completion data.

40. (Canceled)

### REMARKS

#### **Claims 1-40 are Allowable**

The Office has rejected Claims 1-40, in paragraphs 1-3 of the Office Action, under 35 U.S.C. § 103(a) over Weigel, Don; Cao, Buyang; "Applying GIS and OR Techniques to Solve Sears Technician-Dispatching and Home Deliver Problems", Jan/FEB 1999, *Interfaces*, 29, 1, ABI/INFORM Global, p. 112 ("Weigel"), in view of U.S. Patent No. 6,136,607 to Bogart, et al. ("Bogart"). Applicants respectfully traverse the rejection.

No motivation exists to make the combination asserted by the Office. Weigel teaches a vehicle routing and scheduling system that includes an assignment rules module that can use average travel time in assigning technicians or drivers. *See* Weigel, p. 116, col. 2, ll. 11-28. Bogart, on the other hand, teaches a method to maximize call center performance, which can use historical performance of call center agents to assign calls. *See* Bogart, col. 3, ll. 11-21. Weigel should not be combined with Bogart, because optimizing the dispatch of technicians or drivers to service order locations is unlikely to be achieved by evaluating the performance of call center agents. Using performance data related to the call center agents taught by Bogart, in order to dispatch the technicians or drivers taught by Weigel would defeat the efficiency of the system taught by Weigel. Likewise, using performance data related to technicians or drivers taught by Weigel, in order to assign calls to the call center agents taught by Bogart would defeat the optimization of the system taught by Bogart. Hence, there is no motivation to make the combination asserted in the Office Action other than that provided by the Applicants' disclosure. The asserted combination is an impermissible hindsight reconstruction based on the Applicants' disclosure.

Moreover, none of the cited references, including Weigel and Bogart, disclose or suggest the specific combination of Claim 1. In contrast to Claim 1, Weigel teaches a vehicle routing and scheduling system that includes an assignment rules module that can use average travel time

in assigning technicians or drivers. *See* Weigel, p. 116, col. 2, ll. 11-28. Bogart teaches a method to maximize call center performance, which can use historical performance of call center agents to assign calls. *See* Bogart, col. 3, ll. 11-21. Neither Weigel nor Bogart disclose or suggest a service support system that includes a service assignment module configured to assign a service request to a technician from a pool of available technicians based at least in part on a historical technician performance statistic, where the historical technician performance statistic includes an average time at a service location associated with a service order before completing a requested service associated with the service order, as recited in Claim 1. Thus, Claim 1 is allowable.

Claim 13 has been canceled without prejudice or disclaimer. Claims 2-12 depend from Claim 1, which Applicants have shown to be allowable. Thus, the asserted combination of Weigel and Bogart fails to disclose or suggest at least one element of each of the dependent claims 2-12, at least by virtue of their dependency from Claim 1.

In addition, the dependent claims include further features not found in the cited references. For example, none of the cited references, including Weigel and Bogart, disclose or suggest a web-based service request status interface, as recited in Claim 4. Pursuant to MPEP 2144.03(c), Applicants request that the Office provide documentary evidence to support its Official Notice that a web-based service request status interface of a service support system having the features of Claim 1 is well-known in the art. Moreover, Weigel teaches that its technician dispatch system (CARS) "is implemented on a single IBM RS/6000 SP with multiple CPUs," and that "[u]sers access CARS using X-emulation over a wide area network." *See* Weigel, p. 115, col. 2, ll. 22 – p. 116, col. 1, ll. 3. X-windows interfaces that are drawn at X-terminal workstations are distinct from web-based interfaces. For this additional reason, Claim 4 is allowable.

Similarly, none of the cited references, including Weigel and Bogart, disclose or suggest a web-enabled interface that provides data associated with a technician, as recited in Claim 11. Pursuant to MPEP 2144.03(c), Applicants request that the Office provide documentary evidence to support its Official Notice that a web-enabled technician data interface of a service support system having the features of Claim 1 is well-known in the art. Additionally, Weigel teaches

that no aspect of its technician dispatch system (CARS) is operated on a web-based interface, but rather that "CARS is implemented on a single IBM RS/6000 SP with multiple CPUs," and that "[u]sers access CARS using X-emulation over a wide area network." *See Weigel*, p. 115, col. 2, ll. 22 – p. 116, col. 1, ll. 3. X-windows interfaces that are drawn at X-terminal workstations are distinct from web-based interfaces. For this additional reason, Claim 11 is allowable.

Additionally, none of the cited references, including Weigel and Bogart, disclose or suggest the specific combination of Claim 14. In contrast to Claim 14, Weigel teaches a vehicle routing and scheduling system that includes an assignment rules module that can use average travel time in assigning technicians or drivers. *See Weigel*, p. 116, col. 2, ll. 11-28. Additionally, Bogart teaches a method to maximize call center performance, which can use historical performance of call center agents to assign calls. *See Bogart*, col. 3, ll. 11-21. Neither Weigel nor Bogart disclose or suggest a workforce administration system that includes a statistical dispatch logic module that utilizes task specific performance statistics associated with a technician in a pool of technicians to formulate the dispatch instructions, where the task specific performance statistics include an average time at a service location associated with a service order before completing a requested service associated with the service order, as recited in Claim 14. Thus, Claim 14 is allowable.

Claim 15 has been canceled without prejudice or disclaimer. Claims 16-17 depend from Claim 14, which Applicants have shown to be allowable. Thus, the asserted combination of Weigel and Bogart fails to disclose or suggest at least one element of each of the dependent claims 16-17, at least by virtue of their dependency from Claim 14.

Additionally, none of the cited references, including Weigel and Bogart, disclose or suggest the specific combination of Claim 18. Neither Weigel nor Bogart disclose or suggest a dispatch control system having a web-based order status reporting interface, as recited in Claim 18. As explained previously, Weigel teaches that "CARS is implemented on a single IBM RS/6000 SP with multiple CPUs," and that "[u]sers access CARS using X-emulation over a wide area network." *See Weigel*, p. 115, col. 2, ll. 22 – p. 116, col. 1, ll. 3. X-windows interfaces that are drawn at X-terminal workstations are distinct from web-based interfaces. Thus, Claim 18 is allowable.

Claim 27 has been canceled without prejudice or disclaimer. Claims 19-26 depend from Claim 18, which Applicants have shown to be allowable. Thus, the asserted combination of Weigel and Bogart fails to disclose or suggest at least one element of each of the dependent claims 19-26, at least by virtue of their dependency from Claim 18.

Similarly, none of the cited references, including Weigel and Bogart, disclose or suggest the specific combination of Claim 28. Neither Weigel nor Bogart disclose or suggest at least one web page configured to access an order status monitoring module, as recited in Claim 28. As explained previously, Weigel teaches that "CARS is implemented on a single IBM RS/6000 SP with multiple CPUs," and that "[u]sers access CARS using X-emulation over a wide area network." See Weigel, p. 115, col. 2, ll. 22 – p. 116, col. 1, ll. 3. X-windows interfaces that are drawn at X-terminal workstations are distinct from web-based interfaces. Thus, Claim 28 is allowable.

Claims 29-30 depend from Claim 28, which Applicants have shown to be allowable. Thus, the asserted combination of Weigel and Bogart fails to disclose or suggest at least one element of each of the dependent claims 29-30, at least by virtue of their dependency from Claim 28.

In addition, none of the cited references, including Weigel and Bogart, disclose or suggest the specific combination of Claim 30. As explained previously, Weigel teaches a vehicle routing and scheduling system that includes an assignment rules module that can use average travel time in assigning technicians or drivers. See Weigel, p. 116, col. 2, ll. 11-28. Bogart teaches a method to maximize call center performance, which can use historical performance of call center agents to assign calls. See Bogart, col. 3, ll. 11-21. Neither Weigel nor Bogart disclose or suggest a method to facilitate service dispatch that includes assigning the service request to a technician from a pool of available technicians based at least in part on a historical technician performance statistic, where the historical technician performance statistic includes an average time at a service location associated with a service order before completing a requested service associated with the service order, as recited in Claim 30. Thus, Claim 30 is allowable.

Claim 37 has been canceled without prejudice or disclaimer. Claims 31-36 depend from Claim 30, which Applicants have shown to be allowable. Thus, the asserted combination of Weigel and Bogart fails to disclose or suggest at least one element of each of the dependent claims 31-36, at least by virtue of their dependency from Claim 30.

Further, none of the cited references, including Weigel and Bogart, disclose or suggest the specific combination of Claim 38. Neither Weigel nor Bogart disclose or suggest a method of monitoring order status that includes providing an order status associated with the service request via a web-based order status reporting interface, as recited in Claim 38. As explained previously, Weigel teaches that "CARS is implemented on a single IBM RS/6000 SP with multiple CPUs," and that "[u]sers access CARS using X-emulation over a wide area network." See Weigel, p. 115, col. 2, ll. 22 - p. 116, col. 1, ll. 3. X-windows interfaces that are drawn at X-terminal workstations are distinct from web-based interfaces. Thus, Claim 38 is allowable.

Claim 40 has been canceled without prejudice or disclaimer. Claim 39 depends from Claim 30, which Applicants have shown to be allowable. Thus, the asserted combination of Weigel and Bogart fails to disclose or suggest at least one element of the dependent claim 39, at least by virtue of its dependency from Claim 38.

**CONCLUSION**

In view of the foregoing, Applicant(s) respectfully submit that the present application is now in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney or agent.

The Commissioner is hereby authorized to charge any fees that may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date

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